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GROOM LAW GROUP

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

APR 08 2019

SEAN F. MCAVOY, CLERK  
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KEVIN ELLISON,

Defendant,

and

NFL PLAYER SECOND CAREER  
SAVINGS PLAN,

Garnishee.

No. 2:12-CR-00072-LRS

ANSWER AND DECLARATION OF  
GARNISHEE

I am the above-named Garnishee or authorized by the Garnishee to make this declaration on Garnishee's behalf, regarding the Writ of Garnishment.

On, April 1, 2019, Garnishee was served with the Writ of Continuing Garnishment. Further, the Garnishee hereby files this Answer in accordance with 28 U.S.C. § 3205.

1. **DESCRIPTION OF GARNISHEE:** Garnishee files this Answer as:  
(check those that apply)

- An Individual
- In my personal capacity
- Doing business as,

Name of d/b/a:  
Address:  
Phone Number:

1       A Partnership; and Garnishee is:

2       A general partner  
3       A limited partner

4      Name of Partnership:  
5      Address:  
6      Phone Number:

7      ~~XXXXXX CORPORATION~~ A tax-qualified profit sharing plan

8      Name of Corporation: NFL Player Second Career Savings Plan  
9      Affiant's Official Title: Counsel to the plan  
10     Address: 200 St. Paul Place, Suite 2420, Baltimore, MD 21202  
11     Phone Number: 800-638-3186  
12     State of Incorporation: n/a  
13     Principal Place of Business: (address above)

14    2. **PRIOR GARNISHMENTS:** ~~None~~

15    For each previous garnishment involving the Defendant which is still in effect, please  
16    provide the following information:

17    Name of Plaintiff/Garnishor:  
18    Date of Garnishment:  
19    Property Subject to the Previous Garnishment:  
20    Date of Termination:

21    3. **DESCRIPTION OF PROPERTY IN WHICH THE DEFENDANT HAS AN INTEREST:**

22    Garnishee states as follows: (check those that apply)

23     For the pay period in effect on the date the Writ of Garnishment was served,  
24    Defendant was not in my/our employ.  
25     From the date the Writ of Garnishment was served to the date this Answer is being  
26    prepared, Garnishee has **not** had possession, custody or control of any property in  
27    which Defendant and/or the Estate of Defendant has an interest and is in no manner  
28    and upon no account indebted or under liability to Defendant and/or the Estate of  
29    Defendant.

30    ~~X~~ Garnishee has possession, custody or control of the following non-earnings property  
31    in which Defendant and/or the Estate of Defendant has an interest:

32    Description of Property: ~~Defined Contribution Retirement Plan Account~~  
33    Approximate Value of Property: ~~\$80,247.23 as of 4/1/2019~~  
34    Defendant's and/or the Estate of Defendant's Interest in the Property: ~~100% / Estate~~

35     Garnishee anticipates having future possession, custody or control of the following  
36    non-earnings property in which Defendant and/or the Estate of Defendant will have  
37    an interest:

38    Description of Property:  
39    Approximate Value of Property:

**Defendant's Interest in the Property:  
When Defendant Will Acquire An Interest in the Property:**

4. **GARNISHEE'S CLAIMS:** None

Garnishee makes the following claims: (check those that apply)

Garnishee makes the following claim of exemption on behalf of Defendant and/or the Estate of Defendant:

**Amount of Exemption:**

### Nature of Exemption:

Garnishee has the following objections, defenses, or set-offs against the United State's right to seek garnishment of Defendant's and/or the Estate of Defendant's non-exempt property in Garnishee's possession, custody or control:

(describe nature of objection, defense, or set-off)

5. **CERTIFICATE OF SERVICE**

Garnishee certifies that it has served a copy of this Answer on:

**XIX** Clerk of Court  
United States District Court  
Post Office Box 1493  
Spokane, WA 99210-1493

Date of Service: April 2, 2019 / By regular mail at address above  
Method of Service: (include address if service was by mail)

and

**XIX** Estate of Kevin Ellison  
c/o Chris Ellison  
6242 Westchester Parkway, Ste. 240  
Los Angeles, CA 90045

Date of Service: April 2, 2019 / By regular mail at address above  
Method of Service: (include address if service was by mail)

and

**XIX** United States Attorney's Office  
Attn: Financial Litigation  
Post Office Box 1494  
Spokane, WA 99210-1494

Date of Service: April 2, 2019 / By regular mail at address above  
Method of Service: (first class, certified or priority mail)

1 Garnishee declares under penalty of perjury that the foregoing is true and  
2 correct.

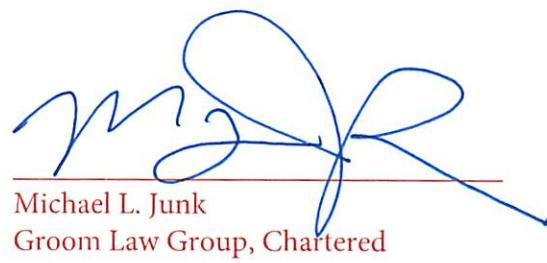
3 **PREPARED BY:** Michael L. Junk, Groom Law Group, Chartered  
4 1701 Pennsylvania Ave. NW, Washington DC 20006

5 **TITLE:** Counsel to the NFL Player Second Career Savings Plan

6 **TELEPHONE NUMBER:** 202-861-5430

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10 Dated: April 2, 2019

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Michael L. Junk  
Groom Law Group, Chartered